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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:
**PROFESSIONAL FINANCIAL INVESTORS,
INC.**, a California corporation, et al.,

Debtors.

Case No. 20-30604 (HLB)

(Jointly Administered)

Chapter 11

**DECLARATION OF MICHELLE
HERMAN IN SUPPORT OF
TRUSTEE'S EIGHTH OMNIBUS
OBJECTION (LATE FILED CLAIMS)**

Date: March 17, 2022
Time: 10:00 a.m.
Judge: Hon. Hannah L. Blumenstiel
Place: Telephonic/Video
Appearances Only

I, Michelle Herman, declare:

1. I am a Senior Managing Director of FTI Consulting, Inc. ("FTI"), financial advisor to the PFI Trust and make this declaration of my own personal knowledge. If called as a witness, I could and would testify competently thereto.

2. I make this declaration in support of the *PFI Trustee's Eighth Omnibus Objection (Late Filed Claims)* (the "Omnibus Objection"). Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Omnibus Objection.

1 3. On April 19, 2021, the Court entered an order establishing May 13, 2021 as the last
2 day for the filing of Proofs of Claim for all non-Investors, except that claims of governmental units
3 against *certain* of the Debtors were subject to different deadlines [Docket No. 575].

4 4. On April 22, 2021, each Claimant was served with the *Notice of Bar Dates for Filing*
5 *Proofs of Claim for Non-Investors and Governmental Units* as reflected in the *Certificate of Service*
6 [Docket No. 608].

7 5. I have determined each of the Claims was filed after the applicable bar date. If the
8 Claims are not disallowed, the parties that filed these Proofs of Claims will receive an excessive
9 recovery to the detriment of other stakeholders in these cases.

10 I declare under penalty of perjury under the laws of the United States of America that the
11 foregoing is true and correct, and that this declaration was executed this 10 day of February 2022 at
12 Los Angeles, California.



Michelle Herman